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Hearing Date:  
May 6, 2014: 9:30 a.m.

*Attorneys for non-party Edward F. Arrigoni*

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

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In re:

OTR MEDIA GROUP, INC.,

Chapter 11

Debtor,

Case No. 1-11-47385 (ESS)

OTR MEDIA GROUP, INC., 203 17TH REALTY LLC,  
SAKELE BROTHERS, LLC and ONE MAIDEN LANE  
REALTY, LLC, *all New York limited liability companies*,  
848 FULTON REALTY CORP. and MING SHENG INC.,  
*New York corporations*, GOTHAM BROAD, LLC, *a*  
*Delaware limited liability company*, FOTINI  
THEOHARIDU, and PHILLIPE JOCELINE, *natural*  
*persons*,

Adv. Pro. No. 1-11-01448 (ESS)

Plaintiffs,

- vs. -

The CITY OF NEW YORK,

Defendant.

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**REPLY DECLARATION OF DONALD E. WATNICK, ESQ. IN SUPPORT OF MOTION  
FOR SANCTIONS AND TO RE-OPEN BY NON-PARTY EDWARD F. ARRIGONI**

DONALD E. WATNICK hereby declares pursuant to 28 U.S.C. §1746 and subject to the penalty of perjury, that the following statements are true and correct:

1. I am counsel for non-party Edward F. Arrigoni and I make this declaration in support of his motion for sanctions in the above-entitled adversary proceeding. I am fully familiar with the facts set forth herein.

2. I am annexing hereto as Exh. A, a copy of a series of emails between myself and Gary Kushner, Esq., counsel for Debtor OTR Media Group, LLC.

3. I am annexing hereto as Exh. B a copy of the signature page for the declaration of Movant Edward Arrigoni, which shows that it was faxed on October 29, 2013 to the offices of my co-counsel, Edward Saviano.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
May 1, 2014

/s/ Donald E. Watnick  
Donald E. Watnick